HONORABLE RICARDO S. MARTINEZ 1 2 3 4 5 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE 6 7 RAQUEL REYNOLDS, a single person, NO. 2:21-cv-01560-RSM 8 Plaintiff, DEFENDANTS' REPLY IN SUPPORT OF 9 MOTION TO DISMISS UNDER FRCP v. 12(c) 10 CITY OF SEATTLE; et al., NOTED FOR CONSIDERATION: 11 Defendants. November 4, 2022 12

Defendants City of Seattle, Pete Cavinta, Jr., Scotty Bach, Daniel Kim, German Barreto, Kira Guzman, and Raymond Fischer ("defendants") request that this Court grant dismissal for the reasons set forth in their Motion for Judgment on the Pleadings (Dkt. # 18). Plaintiff's response to the defendants' motion was due October 24, 2022 (LCivR 7(d)), and she has not filed a response to date. Pursuant to LCivR 7(b)(2), "Except for motions for summary judgment, if a party fails to file papers in opposition to a motion, such failure may be considered by the court as an admission that the motion has merit." Defendants respectfully request the Court grant their Motion for Judgment on the Pleadings, and because no amendment could cure the numerous deficiencies in

DEFENDANTS' REPLY IN SUPPORT OF MOTION TO DISMISS UNDER FRCP 12(c) - 1 (NO. 2:21-cv-01560-RSM)

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CHRISTIE LAW GROUP, PLLC 2100 WESTLAKE AVENUE N., SUITE 206 SEATTLE, WA 98109 206-957-9669

Without Oral Argument

1	plaintiff's complaint, they respectfully request that this Court dismiss it with prejudice.
2	DATED this 31st day of October, 2022.
3	CHRISTIE LAW GROUP, PLLC
4	By <u>/s/ John W. Barry</u>
5	ROBERT L. CHRISTIE, WSBA #10895 JOHN W. BARRY, WSBA #55661
6	Attorneys for Defendants 2100 Westlake Ave. N., Ste. 206
7	Seattle, WA 98109 Phone: 206-957-9669 Exactly held @abrickinlessessessessessessessessessessessessess
8	Email: <u>bob@christielawgroup.com</u> <u>john@christielawgroup.com</u>
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DEFENDANTS' REPLY IN SUPPORT OF MOTION TO DISMISS UNDER FRCP 12(c) - 2 (NO. 2:21-cv-01560-RSM)

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CERTIFICATE OF SERVICE 1 2 I hereby certify that on the 31st day of October, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties and counsel of record: 3 Raquel Martinez (Reynolds) 4 5642 44th Avenue S.W. Seattle, WA 98136 5 Phone: 206-258-1000 Email: policereports2021@gmail.com 6 Plaintiff, Pro Se 7 8 CHRISTIE LAW GROUP, PLLC 9 By <u>s/John W. Barry</u> JOHN W. BARRY, WSBA #55661 10 Attorney for Defendants, 2100 Westlake Ave. N., Ste. 206 11 Seattle, WA 98109 Phone: 206-957-9669 12 Email: john@christielawgroup.com 13 14 15 16 17 18 19 20

DEFENDANTS' REPLY IN SUPPORT OF MOTION TO DISMISS UNDER FRCP 12(c) - 3 (NO. 2:21-cv-01560-RSM)

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